

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Requirements for Digital Television Receiving)	ET Docket No. 05-24
Capability)	

To: The Commission

SUPPLEMENT TO PETITION FOR CLARIFICATION

Insofar as the Commission treats its Petition in the above-referenced docket as a petition for clarification, PDI Communications Systems, Inc. (“PDI”), by its attorneys, hereby submits this supplement thereto.¹ In the Petition, PDI sought reconsideration or clarification with regard to the application of the digital tuners requirements for receivers below 13 inches, to the extent those rules might apply to a specialized institutional video system such as that manufactured and distributed by PDI.

PDI is supplementing the Petition, at the request of the Commission’s staff, to provide more detail about the systems it manufactures and distributes. As explained in the Petition, PDI manufactures and distributes highly specialized video systems used exclusively in the health care industry, whose demanding requirements foreclose the use of off-the-shelf consumer receivers. PDI’s system, as fully described in attachments hereto, is comprised of video displays connected ultimately to a central unit by a single, specialized coaxial cable that supplies multiplexed power and programming. PDI configures its systems so that medical facilities have the flexibility to use video programming of their choice, whether it is from satellite providers, cable operators, off-

¹ See Petition for Reconsideration or Clarification, PDI Communications Systems, Inc., ET Docket No. 05-24 (“Petition”). PDI timely submitted the Petition on January 20, 2006.

the-air broadcast signals, or even recorded material. As such, the tuners used in the PDI video displays merely select from analog channels processed and distributed by a central unit, which is configured to receive the desired programming source and which distributes video signals and the electrical power to operate the display through a single coaxial cable. In this manner, medical patients may select from among whatever video programming choices the medical facility has arranged to be offered.

PDI obviously understands that this month's statutory measures will bring an end to over-the-air analog television broadcast transmissions in 2009. Although the Commission determined just four months ago that it would apply tuner requirements to devices having screens smaller than 13", PDI has been actively developing plans for some time that would allow medical facilities either to convert existing PDI video systems to ones that are digitally compatible or purchase new, digital systems. Because medical facility requirements prevent the use of DTV consumer receivers in these systems and because PDI does not manufacture in volumes that afford priority with technology (*i.e.*, silicon) providers, it will take longer for PDI to complete the transition than for those who manufacture and deliver off-the-shelf consumer receivers. With the larger consumer electronics manufacturers mostly exhausting the capacity of these technology providers, PDI anticipates that it will not be in a position to comply with the rules for another 18-24 months (*i.e.*, 6-12 months after the tuner requirements are effective). If the Commission so desires, PDI can submit reports at designated dates to provide the status of its conversion efforts.

Based on the foregoing, PDI respectfully requests that the Commission clarify whether PDI's specialized video systems must comply with the requirements of the DTV Tuner Order.

Respectfully submitted,

PDI COMMUNICATIONS SYSTEMS

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